

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,)	
)	Case No. 2:15-cv-00102 RSM
Petitioner,)	
)	UNITED STATES' EXHIBIT LIST
v.)	
)	
MICROSOFT CORPORATION, <i>et al.</i>)	
)	
Respondents.)	
_____)	

In accordance with the order orally entered by the Court at the telephonic hearing held on July 7, 2015, the United States submits its exhibit list¹, in preparation for the evidentiary hearing to be conducted on July 21, 2015.

1. Administrative record for Treasury Regulation § 301.7602.1T(b) (as certified for the July 21, 2015 hearing).
2. Contract for the provision of expert services between the Internal Revenue Service and Quinn Emanuel Urquhart & Sullivan, LLP, executed on May 19, 2014.

¹ In addition to the documents identified here, the United States also incorporates into its list its exhibits previously submitted in the record and accepted by the Court as stated during the July 7, 2015 telephonic hearing.

3. Transcript of September 22, 2014 interview of witness Chris Caposella.
4. Transcript of September 23, 2014 interview of witness Bob Kelly.
5. Transcript of September 24, 2014 interview of witness Allison Watson.
6. Transcript of September 25, 2014 interview of witness David Hamilton.
7. Transcript of October 7, 2014 interview of witness Marlena Werder.
8. Transcript of October 10, 2014 interview of witness Chris Suh.
9. July 12, 2012 audit timeline.
10. January 31, 2013 audit timeline.
11. May 30, 2013 audit timeline.
12. Office of Management and Budget Policy Letter 11-01, Performance of Inherently
Governmental and Critical Functions.
13. Internal Revenue Service designated summons issued to Microsoft Corporation and
includible subsidiaries on October 30, 2014.
14. Preliminary Transfer Pricing Analysis of Microsoft's Cost Shared Americas Retail
Business presentation dated January 14, 2014.
15. Estimation of the Fair Market Value of Certain Entities of Microsoft Corporation dated
June 19, 2006.
16. Letter from Microsoft Corporation to the Internal Revenue Service dated June 29, 2011,
and attached Brief in Support of Protest of Proposed Adjustments to the Tax Liability of
Microsoft Corporation & Subsidiaries for Taxable Years Ended June 30, 2004-2006,
regarding Issues 1 and 2.

Potential Demonstrative Exhibits

17. Audit timeline.

18. Structure of transactions at issue.

Dated this 10th day of July, 2015.

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/s Noreene Stehlik

/s James E. Weaver

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